

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
United States of America,  
Plaintiff,

v.

Miles Guo, et al.  
Defendant.

Case No. 23-cr-00118 (AT)

**PETITION UNDER 21 U.S.C. § 853(n)**

**I. Background**

1. I previously filed a motion asking the Court to clarify the meaning of “victim”, since I believed I had received fair value for my G-club membership fees. That motion was denied, and I withdrew it, mistakenly thinking I had no standing.
2. I now understand I may file under 21 U.S.C. § 853(n) as a third party with an interest in forfeited property. If § 853(n) does not apply, I reserve the right to assert CVRA protections.
3. I do not endorse the prosecution’s theory of this case and express no opinion about the Defendant’s guilt or innocence.

**II. Interest in Property**

1. I paid \$20,500 in G-club membership fees, which are among the restrained assets.
2. I claim standing as a bona fide purchaser for value, without knowledge of illegality or forfeiture risk.

**III. Opposition to Other Claims**

1. I object to two categories of claims:
  - a. Creditor registrations filed in the bankruptcy case of the Defendant, which the Court has already ruled were baseless and an obstruction of justice.
  - b. Claims organized or promoted by Himalaya Alliance or Himalaya Farm leaders, including those represented by Attorney Greyer. The Court has recognized these leaders as possible co-conspirators of the Defendant.
2. These claims should not dilute the asset pool or affect legitimate petitions.

#### **IV. Privacy and Redaction**

I respectfully request permission to redact my living address, phone number, email address and financial information from the public docket. This is consistent with Fed. R. Crim. P. 49.1 and the Court's authority to protect privacy and safety. See *Lugosch v. Pyramid Co.*, 435 F.3d 110 (2d Cir. 2006). Because this is a high-profile case with contentious competing claimants, I ask that my contact information be provided only through non-public channels.

#### **V. Relief Requested**

Petitioner respectfully asks the Court to:

1. Recognize standing under 21 U.S.C. § 853(n);
2. Exclude creditor registrations already deemed baseless and obstruction of justice;
3. Exclude claims organized or promoted by Himalaya Alliance or Farm leaders, including those represented by Attorney Greyer;
4. In the alternative, if § 853(n) does not apply, allow Petitioner to assert rights under the CVRA;
5. Grant the request to redact personal identifying information from public filings; and
6. Provide any further relief the Court finds just.

#### **VI. Declaration**

I, Carolyn Sun, declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge and belief.

Executed on: 09/04/2025

Carolyn Sun

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]